

Complaint fails to state a plausible claim for relief against Defendants on any claim, and these claims should be dismissed.

3. Because Plaintiffs have not stated a plausible claim for relief, their class action claim should be dismissed.

Accordingly, Defendants respectfully request that this Court dismiss all of Plaintiffs' claims pursuant to Rule 12(b)(6), dismiss Plaintiffs' class action claims, and grant any other and further relief to which Defendants may be justly entitled.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been furnished to all counsel of record in accordance with the Federal Rules of Civil Procedure this 3rd day of November, 2016.

/s/ Jacob B. Kring
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